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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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October 13, 1994

William F. Caton
Acting Secretary
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Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 94-54, Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services*

On behalf of Pacific Bell, Nevada Bell, and Pacific Bell Mobile Services, please find enclosed an original and six copies of their *"Reply Comments"* in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Alan F. Ciamporcero

Enclosures

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List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services	CC Docket No. 94-54

REPLY COMMENTS OF PACIFIC BELL, NEVADA BELL AND PACIFIC BELL MOBILE SERVICES

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Date: October 13, 1994

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SUMMARY

In the interest of regulatory symmetry, equal access requirements should be imposed on all Commercial Mobile Radio Service ("CMRS") providers as long as equal access requirements are imposed on some CMRS providers. The Commission should reject attempts to impose an equal access structure that exceeds current requirements or that imposes equal access obligations in an uneven manner.

There is no need to create a new federal policy with respect to CMRS interconnection with local exchange companies. The current policy in place with respect to cellular interconnection should be applied to other CMRS providers.

Interstate switching costs are already compensated via federal access charges. Since mobile carriers are not compensating us or being charged by us for interstate interconnection, "mutual" compensation is inapplicable on interstate calls.

To permit a more competitive market between cellular and PCS, cellular providers should be required to allow PCS subscribers to roam onto cellular analog systems out-of-territory at any time and in-territory during the 10 year build-out period. PCS licensees should also be permitted to resell cellular services in-territory for the 10 year build-out period and out-of-territory at any time. Such action will somewhat mitigate the headstart that cellular has in the wireless market.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services	CC Docket No. 94-54 RM 8012

REPLY COMMENTS OF PACIFIC BELL, NEVADA BELL AND PACIFIC BELL MOBILE SERVICES

Pacific Bell, Nevada Bell and Pacific Bell Mobile Services hereby respond to selected issues raised in the comments in the above-captioned proceeding.

I. REGULATORY SYMMETRY REQUIRES THE IMPOSITION OF EQUAL ACCESS ON ALL COMPETING COMMERCIAL MOBILE RADIO SERVICE PROVIDERS.

Commenters were widely split on the issue of imposing equal access requirements on cellular carriers and other competing Commercial Mobile Radio Service ("CMRS") providers. However, the decisive factor is that Congress sought regulatory parity when it passed the Omnibus Budget and Reconciliation Act.[1] If the Commission fails to impose equal access on competing CMRS providers it departs from the Congressional goal.

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[1] In the Matter of Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services, CC Docket 94-54, RM-8012, Notice of Proposed Rulemaking and Notice of Inquiry, released July 1, 1994, para. 2 ("NPRM").

Without equal access, CMRS provided by the BOCs and CMRS provided by non-BOCs will be competing in an uneven regulatory arena that promotes regulatory gaming and distorts the marketplace. Thus, equal access should be mandated for all CMRS providers. Nevertheless, as we explained in our comments, the ultimate regulatory regime for radio services should be one that is free from equal access requirements. Consequently, should it be determined that BOCs are no longer required to provide equal access, any FCC mandated equal access should expire at that time.

II. ANY EQUAL ACCESS STRUCTURE IMPOSED BY THE FCC SHOULD NOT EXCEED CURRENT EQUAL ACCESS REQUIREMENTS.

DCR Communications, Inc. ("DCR") advocated that equal access must include access to all of the information necessary to complete the call of a customer, bill the proper party and support any other services the customer has selected.[2] DCR states that such access requires access to the location and service profiles of the customers. Access to location and service profiles have never been part of equal access. Moreover, such access is not necessary to complete the call and bill the customer.

However, as we indicated in our comments, CMRS providers should be required to provide interexchange carriers ("IEC") the information necessary to do billing on reasonable and non-discriminatory terms. We also support non-discriminatory access to routing information via queries between databases.

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[2] DCR, p. 5.

There is no need for direct access to obtain the routing information necessary to complete the call.

DCR goes on to advocate that equal access of the future must include not only the interconnection of the service portions of networks but also the signaling supporting network intelligence and information.[3] Again, administrative information has never been treated as an equal access issue and there is no reason to include it in an equal access requirement now.

DCR gives the following example:

> In an equal access environment, the caller's home system in Chicago would not send the call to Washington before it first determined the location of the called party. It would send a location and customer profile query to the cellular system in Washington over a signaling network link. The Washington cellular system would respond with a signaling message telling the Chicago carrier that the cellular customer is in Chicago [Washington?] and does not wish to pay airtime for incoming calls (or will pay airtime for incoming calls). The call then can be completed directly to the roaming cellular customer and can be billed to the caller or to the called party.[4]

This is not an equal access issue. It simply illustrates message and instruction queries between home and visited location registers in CMRS databases for administrative information that allows calls to be routed to the appropriate destination over the customer's primary IEC, consistent with the

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[3] Id. at p. 7.

[4] Id.

customer's instruction. Including a discussion of a non-equal access issue in a debate over when and how to extend equal access obligations confuses the issue.

DCR's example appears to seek mandated interconnection to achieve ubiquitous roaming without the need for roaming agreements. Roaming is related to equal access but only to the extent that the call set-up, signaling and the call are delivered over the roamer's primary interexchange carrier. DCR's argument is more appropriate to the portion of this proceeding that deals with interconnection rather than equal access.

III. THE COMMISSION SHOULD REJECT ANY ATTEMPTS TO IMPOSE EQUAL ACCESS OBLIGATIONS IN AN UNEVEN MANNER.

New Par argues that if equal access rules are imposed on cellular carriers they should clearly authorize existing cellular licensees to consolidate adjacent service areas of existing systems even if they go beyond a Major Trading Area ("MTA") boundary.[5]

Any service area chosen for equal access purposes should be applied consistently to all service providers. An equal access structure that creates exceptions should be firmly rejected by the Commission. As we stated in our comments, we support the adoption of MTAs for service boundaries for equal access purposes and we urge the Commission to require all CMRS providers subject to the equal access requirement to comply with the same boundaries without exception.

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[5] New Par, p. 14.

IV. THE CURRENT SYSTEM IN PLACE WITH RESPECT TO CELLULAR INTERCONNECTION TO LECS SHOULD BE APPLIED TO CMRS INTERCONNECTION TO LECS.

The Commission received a wide range of comments on the issue of whether to impose a federal tariffing requirement for interconnection between LECs and CMRS providers. They ranged from retaining the current federal structure regarding interconnection[6] to preempting state interconnection rates and requiring federal tariffs for interstate and intrastate rate elements.[7] The latter is clearly an untimely petition for reconsideration of the Commission's decision not to preempt state interconnection rates and must be rejected.

We continue to believe that the current policy in place with respect to LEC interconnection with cellular providers should be extended to LEC interconnection with other CMRS providers. This policy which consists of a policy statement rather than specific rules has worked well. We note that the Cellular Telecommunications Industry Association ("CTIA") which has had a great deal of experience working with the current system states, "absent specific evidence of discrimination or unreasonable delay there is no sound reason for replacing such a successful regulatory framework."[8] We agree. There is no current justification for expending Commission resources to put in place a new regulatory structure, be it tariffing or requiring model interconnection agreements, or requiring contracts to

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[6] Vanguard, p. 21; One Comm Corporation, p. 20.

[7] Point Communications, p. 5.

[8] CTIA, p. 20.

be filed. As the Commission's current policy recognizes, compensation in this area is largely a matter of state, not federal concern.[9]

Cox argues that the Commission must look beyond LEC provision of mere physical interconnection and confirm the need for fully unbundled network capabilities. Cox wants LEC data bases and other network capabilities included within the scope of LEC interconnection offerings and requests that they be offered on an unbundled basis. Cox alleges that "anything less will impose costs on LEC competitors that LECs themselves will not be required to bear and will delay the introduction of innovative new services to consumers." It is unclear to what databases and network capabilities Cox is referring but in any case Cox's logic is unsound. We bear the cost of our databases and network capabilities and competitors have the opportunity to develop their own databases and capabilities. Access to certain network capabilities is being considered in the Advanced Intelligent Network Proceeding in Docket No. 91-346 and is clearly beyond the scope of this proceeding. Cox's position should be rejected.

V. AN INTERCONNECTION RATE THAT IS THE SAME FOR ALL SIMILARLY SITUATED CUSTOMERS IS NON-DISCRIMINATORY.

Comcast states that "a requirement that LEC CMRS affiliates pay the same high interconnection rate as other CMRS providers is of no consequence to the LEC because the cost is a pocket-to-pocket transfer."[10] Cox similarly states

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[9] In the Matter of the Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, 59 RR 1275, 1284-85 (1986).

[10] Comcast, pp. 15-16.

that "LECs can negotiate an interconnection rate with their cellular affiliate (and in the future with themselves as a PCS operator) and then impose that same "non-discriminatory" rate on CMRS competitors."[11]

A rate is developed through cost analysis and with respect to interconnection, the same interconnection arrangement is based on the same costs regardless of the customer. Moreover, Cox and Comcast ignore the fact that any interconnection charge between affiliates is not simply a pocket to pocket transfer. An affiliate desires an appropriate interconnection rate to the same extent any other CMRS provider because the rate affects the price that is charged to customers. Too high a price will put the affiliate in a less competitive position. Moreover, Cox's and Comcast's position suggests that LECs have the ability to cross-subsidize across affiliates. Cost allocation rules are in place to prevent cross-subsidy. In California the interconnection rate will soon be offered under tariff which provides additional protection against discriminatory application of the rates.

VI. THE COMMENTS RELATING TO MUTUAL COMPENSATION EVIDENCE A GREAT DEAL OF CONFUSION AND PROVIDE NO BASIS FOR A CHANGE IN THE COMMISSION'S POLICY IN THIS PROCEEDING.

In the cellular interconnection proceeding mutual compensation was ordered under the following circumstances:

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[11] Cox, p. 6.

1. Mutual compensation relates to the costs of interstate switching.[12] It does not relate to intrastate traffic.

2. It allows the landline or the cellular carrier to recover "its actual cost of switching traffic for the other carrier."[13] In other words, each must independently establish its costs related to interstate switching.

These principles are clearly stated. They were extended but not expanded upon with respect to CMRS.[14] However, many commenters seek to alter these principles. Several commenters urge the Commission to apply mutual compensation principles to intrastate traffic. APC claims that, "Because mutual compensation should be seen as an inherent part of the provision of reasonable interconnection, there is no jurisdictional issue."[15] APC ignores the fact that the Commission previously declined to preempt intrastate interconnection rates.[16] It did so because it found that the LEC rates for interconnection are severable into interstate and intrastate rates because the costs are severable. Thus, pursuant to

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[12] In the Matter of the Need to Promote Competition and Efficient use of spectrum for Radio Common Carrier Services, Memorandum Opinion and Order on the Consideration. 4 FCC Rcd 23, p. 25 (1989).

[13] Id. at para. 20.

[14] Implementation of Sections 3(n) and 332 of the Communications Act, Second Report and Order, GEN Docket 93-252, 9 FCC Rcd 1411, 1498, citing Interconnection Order, 2 FCC Rcd at 2915. ("Second Report and Order")

[15] APC, p.5

[16] Second Report and Order, p. 1497, 1501.

Section 152(b) of the Communications Act, the Commission has no authority to preempt state authority relating to intrastate interconnection rates.[17]

Mutual compensation is a rate issue relating to interconnection. The extent to which a state regulatory commission desires to regulate mutual compensation for intrastate interconnection has been and must remain in its sole discretion.

Several commenters have complained about the lack of mutual compensation despite the Commission's pronouncements on the policy with respect to cellular carriers several years ago.[18] There is a very good reason for this. The interstate costs of interstate switching are already addressed by federal access charges. Interstate calls originated by a mobile customer are handled one of two ways. Either the call goes directly to an interexchange carrier or it comes to us and we switch it to an interexchange carrier ("IEC"). In the first case, we obviously have no costs and no necessity for compensation. In the second case, our interstate switching costs are compensated by the IEC and we do not charge the mobile carrier for interconnection. If we are receiving an interstate call and handing it off to a mobile customer, we are again being compensated by the IEC through interstate access charges and there is no interconnection charge assessed

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[17] Louisiana Public Services Comm. v. FCC, 476 U.S. 355, 383 (1986). "By its terms this provision [Section 152(b)] fences off, from FCC reach or regulation intrastate matters - indeed, including matters 'in connection with' intrastate service."

[18] Pagenet, p.10; Columbia PSC, p. 6.

on the mobile carrier. Consequently, interstate switching costs are already compensated via federal access charges. Since mobile carriers are not compensating us nor being charged by us with respect to interstate calls, "mutual" compensation is inapplicable.

Several commenters exhibit confusion about the principles of rates for mutual compensation. For example, Cox argues that the LECs will set the rate artificially high because the LEC will be more often receiving the amount rather than paying it.[19] This argument presupposes that those paying mutual compensation will have identical costs relating to interstate switching or that the one payer of the compensation will adopt the rate of the other. The former is highly unlikely and the latter is in direct conflict with the FCC's costing principle. The FCC has made clear that those carriers entitled to mutual compensation must establish their own costs. Thus, traffic imbalance is completely irrelevant to the issue of appropriate compensation under the Commission's principles. Moreover, as explained in the above, we do not believe mutual compensation is applicable to LECs with respect to interstate traffic.

In summary, mutual compensation is an area fraught with misunderstanding. The Commission should reiterate that its statements on mutual compensation are limited to the interstate jurisdiction and that it is not preempting state interconnection rates in any way. As it correctly recognized with respect to cellular interconnection, "cellular carriers are generally engaged in the

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[19] Cox, p. 9

provision of local, intrastate, telephone service [and] the compensation arrangements among cellular carriers and telephone companies are largely a matter of state, not federal concern."[20] In addition, it would be helpful for the Commission to explain why it believes that switching costs for interstate interconnection require mutual compensation since the access charge structure already compensates for costs associated for switching interstate calls. Finally, to the extent that there is any mutual compensation required for interstate switching, the Commission should also reiterate that any compensation to CMRS providers must be related to their costs which they will have to disclose in order to establish a rate for compensation.

If the Commission decides any departure from existing precedent is necessary, it should address mutual compensation issues in a separate proceeding. The record in this proceeding is confusing and incomplete. The only change that the record does support is the finding that mutual compensation should not apply at all to interstate calls since mobile carriers are not assessed charges for interstate switching costs.

VII. COMMISSION ACTION TO SUPPORT ROAMING ONTO CELLULAR ANALOG SYSTEMS BY PCS PROVIDERS IS NECESSARY.

Southwestern Bell states that Commission mandates in the area of roaming are not required because economic forces alone will spur the growth of the

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[20] FCC Policy Statement on Interconnection of Cellular Systems, 59 R.R. 2d 1283, 1284 (1986)

CMRS roaming markets.[21] As we explained in our comments, we do not believe market forces alone will support roaming between PCS providers and analog cellular providers. This type of roaming is critical to PCS providers so they can establish the kind of ubiquity that will allow true competition with cellular providers. Consequently, we disagree with Southwestern Bell and we reiterate our request that the Commission mandate the cellular providers be required to enter into roaming agreements as fully described in our comments.[22]

APC requests that cellular providers be required to interconnect HLR & VLR databases with PCS providers so that roaming is technically feasible. This is simply another way to address the head start that cellular providers have. We proposed in our comments that the FCC mandate that PCS providers have fair and non-discriminatory access to cellular analog out-of-territory networks at any time and to cellular in-territory networks during the 10 year built-out period. Mandated interconnection to cellular HLR and VLR databases would also achieve the desired result - the necessary ubiquity to enable real competition with cellular providers.

VIII. PCS LICENSEES SHOULD BE PERMITTED TO RESELL CELLULAR SERVICE IN THEIR SERVICE TERRITORY.

Southwestern Bell, BellSouth and the Rural Cellular Association all oppose resale of cellular services by other facilities based CMRS providers.

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[21] Southwestern Bell, p.61.

[22] Pacific Bell and Pacific Bell Mobile Services, pp. 19-24.

Southwestern Bell argues that to do otherwise would be harmful to the development of the CMRS market.[23] The Rural Cellular Association states that a "piggyback" on cellular carriers deters competition.[24] BellSouth argues that new carriers should be strongly encouraged to develop and deploy the infrastructure needed to provide competitive facilities based service.[25] McCaw states that "Facilities-based competitors eligible to resell the incumbent's capacity could and would delay construction of their own networks, possibly deciding to limit or abandon construction. This is likely to be particularly true for PCS licensees whose build out obligation is based on population rather that geographical coverage."[26]

None of these arguments are the least bit compelling. All of the commenters ignore the significant headstart that cellular has had and that resale will help to mitigate this headstart somewhat. Cellular carriers have every incentive to retain the head-start. For example, Lee Cox, President of AirTouch, "estimated that it will take PCS carriers seven or eight years to deploy networks as ubiquitous as cellular and by that time cellular carriers will have improved their networks even further."[27]

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[23] Southwestern Bell, p. 58.

[24] Rural Cellular Association, p. 11.

[25] BellSouth, p. 24.

[26] McCaw, p. 22.

[27] Charles F. Mason, AirTouch Execs Say PCS Will Play Small Role, Telephony, April 18, 1994, at 12.

The commenters all also underplay the stringent build-out requirement imposed upon PCS licensees. The fact that the build-out requirement is based on population rather than geography provides no basis for concluding that PCS licensees have an incentive to limit construction of their own network. If anything the population standard is a more stringent standard because it requires capacity considerations in the network design to ensure the population is covered. PCS licensees have every incentive to meet these requirements because the penalty for failure (forfeiture of the license) is so high.

These opposing commenters simply seek to protect their head start. The Commission should reject their arguments and permit in region PCS licenses to resell cellular services during the 10 year build-out period and out-of-region at any time. Competition will be served by this position.

IX. THE COMMISSION'S CELLULAR RESALE POLICY REQUIRES THAT RESELLERS BE ELIGIBLE FOR BULK RATES MADE AVAILABLE TO OTHER CELLULAR CUSTOMERS.

CTIA requests that the Commission clarify that cellular providers are not required to offer bulk rates to resellers.[28] While we agree that the cellular resale policy does not require the creation of a specific wholesale rate, the policy does require any bulk rate made available to some customers must be made available to resellers on the same terms and conditions. This is critical to the resale market and we urge the Commission to make clear that resellers are eligible for bulk rates made available to other cellular customers. As noted above,

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[28] CTIA, p. 35.

resale of cellular service by PCS providers helps to mitigate the headstart cellular providers have. But without the ability to purchase at a bulk rate the market for resale will disappear.

X. CONCLUSION.

In amending the Communications Act Congress sought to achieve regulatory parity in the regulation of CMRS providers. The Commission can further this goal in several ways. One, as long as an equal access requirement is imposed on some CMRS providers it should be imposed on all CMRS providers. Two, the current federal interconnection policy for LEC interconnection with cellular providers should be extended to all CMRS providers. Three, mutual compensation should be recognized as an intrastate issue, subject to intrastate jurisdiction. Four, competition between cellular and PCS providers should be supported by mandating roaming between the two systems and permitting PCS

licensees to resell cellular services. These steps will permit a truly competitive CMRS marketplace to develop.

Respectfully submitted,

PACIFIC BELL
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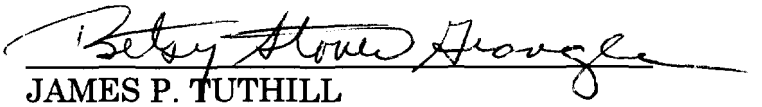

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CERTIFICATE OF SERVICE

I, Alex Kositsky, do hereby certify that a copy of the foregoing Reply Comments of Pacific Bell, Nevada Bell, and Pacific Bell Mobile Services re CC Docket No. 94-54, RM 8012 was mailed via first class United States mail, postage prepaid, on this 13th day of October, 1994, to the parties on the following list.

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